



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP/TH
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 5, 2018

By Email

Marc Agnifilo, Esq.
Brafman & Associates
767 Third Avenue
New York, NY 10017

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (S-1) (NGG)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government is sending you a link to one discovery production this evening in the cover email to this letter. The password for that production is listed below. Additionally, the government is making available through DupeCoop discovery copies of the items numbered DSCV_00000061-62 and DSCV_00000065 below. You may obtain this discovery by calling John Palermo of DupeCoop at (973) 895-1359. Our search as to these items is ongoing.

This discovery is being provided to you pursuant to the protective order entered by the Court on August 1, 2018.

The government will continue to provide discovery on a rolling basis and continues to request reciprocal discovery from the defendant.

BATES RANGE	DESCRIPTION/PASSWORD	DESIGNATION
NXIVM00026761- NXIVM00030116	L. Salzman iCloud—partial search results; search ongoing NXIVM00026761!	Subject to Protective Order
DSCV_00000061	8 Hale Drive, Western Digital storage device, 1B16	Subject to Protective Order
DSCV_00000062	8 Hale Drive, Apple iPod with accessories, 1B50	Subject to Protective Order

BATES RANGE	DESCRIPTION/PASSWORD	DESIGNATION
DSCV_00000065	<div style="background-color: black; width: 150px; height: 1.2em; display: inline-block;"></div> SW return	Subject to Protective Order

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Moira Kim Penza
Moira Kim Penza
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